

Public Hearing – March 10, 2023
Environment Committee

Testimony Submitted by Commissioner Katie S. Dykes

House Bill No. [6814](#) – An Act Concerning the Establishment of a Coding System for the Designation of Recyclable and Compostable Products

Thank you for the opportunity to present testimony regarding House Bill No. 6814 – An Act Concerning the Establishment of a Coding System for the Designation of Recyclable and Compostable Products. The purpose of this bill is to require that the Commissioner of the Department of Energy and Environmental Protection (DEEP) establish a coding system for plastic packaging, establish a grant program in conjunction with RecycleCT for manufacturers, and develop educational programming in conjunction with RecycleCT for non-plastic packaging alternatives.

DEEP **supports the concepts** of consumer awareness regarding recyclability and compostability and using non-plastic alternatives where viable but has **concerns with the bill as drafted** for the reasons outlined below.

Section 1(a) of the bill requires the DEEP Commissioner to establish a standardized coding system for plastic packaging, plastic bags, container-lined packaging, and plastic-coated packaging products to identify if the product is recyclable (marked with a green “R”), compostable (marked with a green “C”), or neither (marked with an interdictory circle). DEEP is concerned that this proposed coding system may not provide consumers with enough information and may adversely impact recycling efforts. Many items can be recycled but not be collected and accepted in all programs. For example, if a plastic bag was marked “R” because it was recyclable, it may be because the bag can be recycled if it is separated and aggregated with similar plastic bags to be sent off for processing (as is done at some retail locations). However, consumers may infer that the “R” means that the plastic bag can go in the blue bin, where it will not be able to be recycled and could get caught in the machinery at the materials recovery facility (MRF). Other potentially recyclable plastic packaging products, such as plastic films, expanded polystyrene egg cartons, or plastic spray bottles that held toxic cleaning products, could create similar challenges.

Additionally, DEEP is concerned about establishing a coding system that is inconsistent with national/international standards or other states. DEEP suggests referencing specific standards in the bill and is willing to work with the Committee and stakeholders to determine what standards may be appropriate.

Section 1(b) of the bill requires DEEP, in conjunction with RecycleCT, to establish a grant program to enable manufacturers to transition to non-plastic packaging alternatives that are recyclable or compostable. RecycleCT is a non-profit organization – separate from DEEP – that is charged with providing research and education regarding recycling in the state and administering grants for that purpose. RecycleCT's grant programs are dependent on a stable revenue source, which currently doesn't exist. Additionally, DEEP is unsure of the budget needed to support manufacturers' transitioning to non-plastic recyclable or compostable alternatives, which could be costly, and of the funding source to support this effort.

Section 1(c) requires DEEP to work with RecycleCT to develop and implement educational programming regarding non-plastic packaging alternatives that are recyclable or compostable. This provision could help alleviate some of the confusion we would expect from the coding system required by Section 1(a), or any other types of standards the Committee might consider; however, there is no funding allocated in the bill for educational programming.

DEEP is happy to have further discussion with the Committee on this topic.

Thank you for the opportunity to present testimony on this proposal. Should you have any questions, please do not hesitate to contact Harrison Nantz at Harrison.Nantz@ct.gov.